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11 *Attorneys for Plaintiff, Deutsche Bank National Trust Company, Formerly Known as Bankers*
12 *Trust Company of California, N.A., as Trustee for American Home Mortgage Investment Trust*
13 *2005-2*

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 DEUTSCHE BANK NATIONAL TRUST
17 COMPANY, FORMERLY KNOWN AS
18 BANKERS TRUST COMPANY OF
19 CALIFORNIA, N.A., AS TRUSTEE FOR
20 AMERICAN HOME MORTGAGE
21 INVESTMENT TRUST 2005-2,

22 Plaintiff,

23 vs.

24 FIDELITY NATIONAL TITLE GROUP,
25 INC.; FIDELITY NATIONAL TITLE
26 INSURANCE COMPANY;
27 COMMONWEALTH LAND TITLE
28 INSURANCE COMPANY; DOE
INDIVIDUALS I through X; and ROE
CORPORATIONS XI through XX, inclusive,

Defendants.

Case No.: 2:20-cv-01885-APG-VCF

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO COMMONWEALTH LAND TITLE
INSURANCE COMPANY'S
OPPOSITION TO COUNTERMOTION
FOR PARTIAL SUMMARY
JUDGMENT [ECF No. 36]**

[Fifth Request]

Plaintiff, Deutsche Bank National Trust Company, Formerly Known as Bankers Trust
Company of California, N.A., as Trustee for American Home Mortgage Investment Trust 2005-
2 ("Deutsche Bank") and Defendant, Commonwealth Land Title Insurance Company
("Commonwealth"), by and through their attorneys of record, hereby stipulate and agree as
follows:

1. On September 23, 2020, Deutsche Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-20-821781-C [ECF No. 1-1];
2. On October 8, 2020, Commonwealth filed a Petition for Removal to this Court [ECF No. 1];
3. On October 13, 2020, Commonwealth filed a Motion to Dismiss [ECF No. 4];
4. On November 30, 2020, Deutsche Bank filed an Opposition to Commonwealth's Motion to Dismiss and Countermotion for Partial Summary Judgment [ECF Nos. 24 and 25];
5. On December 21, 2020, Commonwealth filed its Reply in Support of its Motion to Dismiss and Opposition to Countermotion for Partial Summary Judgment [ECF No. 36];
6. Deutsche Bank contends that it is entitled to file a response to Commonwealth's Opposition to its Countermotion for Partial Summary Judgment and that its deadline to do so is March 1, 2021 [ECF No. 46];
7. Deutsche Bank's counsel is requesting an extension until March 19, 2021 to respond to Commonwealth's Opposition;
8. This additional extension is requested to allow Deutsche Bank additional time to finalize and file its response to the Opposition as lead handling counsel for Deutsche Bank continues to recover from an unexpected medical emergency. The associate counsel for Deutsche Bank has also contracted coronavirus, which has made finalizing the brief exceptionally difficult.
9. Counsel for Commonwealth does not oppose the requested extension to the extent that a response is permitted;

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